

Hearing Date and Time: June 15, 2011 at 10:00 a.m. (Prevailing Eastern Time)

Objection Date and Time: June 8, 2011 at 4:00 p.m. (Prevailing Eastern Time)

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

1633 Broadway,

New York, NY 10019

Telephone: (212) 506-1700

Facsimile: (212) 506-1800

Marc E. Kasowitz (mkasowitz@kasowitz.com)

Michael J. Bowe (mbowe@kasowitz.com)

Robert M. Novick (rnovick@kasowitz.com)

Albert S. Mishaan (amishaan@kasowitz.com)

Gary W. Dunn (gdunn@kasowitz.com)

Special Counsel for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | |
|--|---------------------------|
| ----- | X |
| In re | : Chapter 11 |
| | : Case No. 08-13555 (JMP) |
| | : |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : Jointly Administered |
| | : |
| Debtors. | : |
| ----- | X |

**NOTICE OF MOTION OF LEHMAN BROTHERS HOLDINGS, INC.
TO COMPEL THE PRODUCTION OF DOCUMENTS
FROM GOLDMAN SACHS & CO. AND GOLDMAN SACHS GROUP, INC.**

PLEASE TAKE NOTICE that a hearing on the annexed motion (the "Motion") of Lehman Brothers Holdings, Inc. ("Lehman") and its affiliated debtors (collectively, the "Debtors"), as debtors and debtors in possession, for entry of an order compelling Goldman Sachs & Co. and Goldman Sachs Group, Inc. (collectively, "Goldman Sachs") to produce documents in compliance with Rule 2004 of the Federal Rules of Bankruptcy Procedure, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green,

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New York, New York 10004 (the "Bankruptcy Court"), on **June 15, 2011 at 10:00 a.m.**

(prevailing Eastern Time) (the "Hearing").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Kasowitz, Benson, Torres & Friedman LLP, 1633 Broadway, New York, New York, 10019, Attn: Gary W. Dunn, Esq. and Michael J. Bowe, Esq., special counsel to the Debtors; (iii) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, counsel to the Debtors; (iv) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York, 10004, Attn: Tracy Hope Davis, Esq., Elisabetta G. Gasparini, Esq., and Andrea B. Schwartz, Esq., (v) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq., counsel to the official committee of unsecured creditors appointed in these cases, and (vi) all parties who have requested notice in these chapter 11 cases, so as to be so filed and received by no later than **June 8, 2011 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline").

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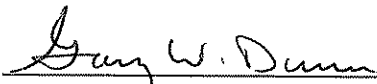
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PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: May 31, 2011
New York, New York

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

By: 
Marc E. Kasowitz (mkasowitz@kasowitz.com)
Michael J. Bowe (mbowe@kasowitz.com)
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Albert S. Mishaan (amishaan@kasowitz.com)
Gary W. Dunn (gdunn@kasowitz.com)

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